

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
DISH NETWORK L.L.C.

Plaintiff,

v.

GOYAL GROUP INC. and CHANDRA  
GOYAL d/b/a Goyal Group, RANA  
TECHNOLOGY INC. and MOHAMMAD  
RANA d/b/a Family Phone, ABC 1 NYC  
INC. and SONAM SANGPO d/b/a ABC  
Wireless NYC,

Defendants.  
-----X

Case No. 18-cv-3857

**REQUEST FOR CERTIFICATE OF  
DEFAULT AGAINST SONAM SANGPO**

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure and Local Civil Rule 55.1, Plaintiff DISH Network L.L.C. respectfully requests that the Clerk issue a certificate of default against Defendant Sonam Sangpo for failure to plead or otherwise defend the above-captioned action as fully appears from the Court file herein and from the attached Declaration of Stephen M. Ferguson.

Dated: August 8, 2018

Respectfully submitted,

/s/ Stephen M. Ferguson

Stephen M. Ferguson (*pro hac vice*)

stephen.ferguson@hnbllc.com

Joseph H. Boyle (*pro hac vice*)

joe.boyle@hnbllc.com

**HAGAN NOLL & BOYLE, LLC**

Two Memorial City Plaza

820 Gessner, Suite 940

Houston, Texas 77024

Telephone: (713) 343-0478

Facsimile: (713) 758-0146

James T. Sandnes

jsandnes@skarzynski.com

**SKARZYNSKI, BLACK, LLC**

One Battery Park Plaza, 32nd Floor

New York, NY 10004  
Telephone: (212) 820-7700  
Facsimile: (212) 820-7740

Attorneys for Plaintiff DISH Network L.L.C.

**CERTIFICATE OF SERVICE**

I hereby certify that on August 8, 2018, a true and correct copy of Plaintiff's Request for Certificate of Default Against Sonam Sangpo, Declaration in Support of Request for Certificate of Default Against Sonam Sangpo (with Exhibits 1-4), and Proposed Certificate of Default Against Sonam Sangpo were served by placing the documents in sealed envelopes with postage thereon fully prepaid and then deposited the envelopes with the United States Postal Service (Certified Mail, Return Receipt Requested), addressed to the following non-CM/ECF participants:

Sonam Sangpo  
89-14 34th Ave., Apt. 1E  
Jackson Heights, NY 11372

/s/ Stephen M. Ferguson  
Stephen M. Ferguson (*pro hac vice*)  
**HAGAN NOLL & BOYLE, LLC**  
Two Memorial City Plaza  
820 Gessner, Suite 940  
Houston, Texas 77024  
Telephone: (713) 343-0478  
Facsimile: (713) 758-0146